

## Complaint Description

### File a Formal Complaint - Glen Morgan

[Glen Morgan](#) reported (Thu, 21 Jun at 7:04 PM) via Portal [Meta](#)

To Whom it May Concern –

It has come to my attention that the Washington State Association for Justice - Justice for All PAC has habitually and willfully committed frequent and multiple violations of **RCW 42.17A**. The violations documented here are extensive and egregious.

#### 1) Failure to file accurate, timely C3 and C4 reports. (Violation of RCW 42.17A.235)

State law requires that candidates and committees file frequent, accurate reports of contributions, expenditures, in-kind contributions, and debt. Unfortunately, the Washington State Association for Justice - Justice for All PAC has failed on numerous occasions to do this. (See **Exhibits A - "Illegally late deposits and contributions"**).

Please note that these reports were reported over **1,984 cumulative days late**. This isn't just a technical mistake or error. Many of these are first time reports, and for many of the revised reports, they are not just technical corrections. These PAC officers and its treasurer are seasoned and experienced in the political process and are well aware of the significance of their repetitive violations of state law. This may have been a systematic attempt to disguise the true source of campaign funding and how the campaign used expenditures until long after the campaign was over. The law, for this PAC, is being treated like an afterthought or maybe a guideline with no consequences.

The PDC should investigate the possibility that the Washington State Association for Justice - Justice for All PAC committed the above violations maliciously, which would be a class C felony per **RCW 42.17A.750 (2)(c)**. If the PDC determines that is the case, they should refer the case to the Attorney General's office for criminal prosecution immediately.

Please note that I have provided the attached spreadsheets in two different file formats for staff convenience.

Please don't hesitate to contact me if you need any additional information.

Best Regards,

Glen Morgan

**What impact does the alleged violation(s) have on the public?**

The public (and the media - who often report the facts to the public) has been repeatedly and systematically denied accurate, correct, and timely information about who is funding the Washington State Association for Justice - Justice for All PAC, how this PAC is spending the money they receive and by doing so, they are disguising and obscuring the source of funding for the PAC and how the PAC spends that same money. This is far more than just a technical mistake. Many of these reports are submitted months late, and it should be noted these late reports often occurred within the critical 30 day window of elections in 2015, 2016 and 2017. This behavior appears to be ongoing and likely to continue through the elections of 2018 unless there are tangible consequences for these repetitive violations. The public can have no certainty that any of the reports filed by this PAC are currently accurate or true representations of expenditures or contributions at this time.

**List of attached evidence or contact information where evidence may be found.**

A list has been provided in both Excel and PDF file formats for staff convenience which details each late C3 and C4 report, including PDC tracking #s for each report, date they were due, date they were filed and the days late for each. Additionally, for staff convenience the total days late for the cumulative reports has been included will this evidence and referenced in the original complaint. It may be necessary to review bank statements going back to 2015 in order to verify if any documents on file are accurate or if additional changes need to be made with the filing documents.

**List of potential witnesses with contact information to reach them.**

All information provided and referenced can be verified using publicly available C3 and C4 reports as referenced in the complaint and backup documents provided. Please note, judging from the extensive, repetitive, and egregious nature of these violations, this investigation may require interviewing both the PAC officers and the treasurer to see how many additional reports are missing or missing information. It may also be necessary to interview a sampling of donors and vendors to determine how far from the truth the current reporting situation currently is.